

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TITUS MCBRIDE,

Plaintiff,

No.15-CV-3203(CM)

-against-

INTERROGATORIES
(Fed.R.Civ.P.33(a))

THE CITY OF NEW YORK,
DETECTIVE ALBERT VELEZ, et al.,
Defendants,

Indeed no more than (affidavits
is necessary to make the prima
facie. United States vs Kis, 658
F.2nd, 526, 536 (7th Cir. 1981): Cert
denied, 50 United States L.W.
2169: Ct. March 22, 1983

STATE OF NEW YORK)
COUNTY OF BRONX) s.s;

Sui Juris Affidavit
Identification Interrogatories
Summary of Rule Provisions Rule 33(a)

I, TITUS MCBRIDE, being duly sworn, deposes and says:
I am the petitioner in the above-entitled proceeding, I make this
Affidavit as a sui juris interrogatories..

TO: Assistant Corporation Counsel, DAVID COOPER
THE CITY OF NEW YORK LAW DEPARTMENT: 100 CHURCH STREET, NEW YORK, NY 10007
FROM: Plaintiff, TITUS MCBRIDE, Docket No. 2014 NYD 31682
ROBERT N. DAVOREN CENTER (RND C) 11-11 HAZEN STREET,
EAST ELMHURST, NEW YORK, 11370.

TITUS MCBRIDE, IS REQUESTING, that you David Cooper answer all of the
following interrogatories, in writing and under oath, as required by
Rule 33 of the Federal Rules of Civil Procedure. According to Rule 33
a copy of your written response to these interrogatories must be served
on 21st day of October, 2016

The Attorney for The City of New York at the address listed in this document.

INTERROGATORY NO.1: Did law enforcement violate my rights to due process
and equal protection of law, when CODIS had strongly
recommended that if legal action is anticipated before
making an arrest to get a new sample and have that sam,
ple confirmed.

ANSWER: _____

INTERROGATORY NO.2: Did law enforcement have Probable Cause to cross the three-hold of my home without a warrant or exigent circumstance to make an arrest.

ANSWER: _____.

INTERROGATORY NO.3: ADA CHARLES KEE did the DNA evidence that was use to Arrest and illegally detained me on April 21,2014 the same evidence that exonerated me on August 17,2015.

ANSWER: _____.

INTERROGATORY NO.4: Why after the DNA has exonerated me 14 months ago why am I still being illegally detained.

ANSWER: _____.

INTERROGATORY NO.5: CHARLES KEE why did you violate your public oath of office according to Article(13) of the Constitution with malicious prosecution toward my 14th,4th,6th, 5th Amendment of the United States Constitution.

ANSWER: _____.

INTERROGATORY NO.6:

Did the people violate statute penal law§210.45, by filing a false felony complaint that stated my DNA is a match, when the factual bases was not confirmed nor could the DNA be corroborated by the fax from the Director, of Forensic Services that stated if legal action is anticipated law enforcement need to get a new DNA to be confirmed.

ANSWER: _____.

INTERROGATORY NO.6:

Was their a lack of subject matter jurisdiction when the people filed a fraudulent felony complaint to commence a criminal act against the defendant and habded that false instrument as insufficient evidence to the grand jury that gave the Supreme Court illegal Jurisdic, tion over the subject matter? Did the people violate criminal procedure law§100.05 the filing of the first accusatory instrucment,100.15 the fac, tual part of the accusatory instrucment,100.40 Thus one sort of defect deprives the court of jurisdiction to restrain defendant's freedom which deprives the court of power to proceed and cannot be waved.

ANSWER: _____.

INTERROGATORY NO.7:

Was their legally sufficient evidence meaning competent evidence which if accepted as "true" would establish every element of an offense charged and the defendant commission therof; except that such evidence is not legally sufficient when corroboration required by law is absent,(confirmed DNA?)

ANSWER: _____.

I, Titus McBride, declare under the penalty of perjury, pursuant to 28 U.S.C. §1746, that on October 13, 2016, I placed in the US postal mail Interrogatories Questions Address to Assistant Corporation Counsel, David Cooper

Dated

October 13, 2016
Titus McBride

Titus McBride, Pro Se Litigant

By:

Titus McBride

ROBERT N. DAVOREN CENTER (RNDC)
11-11 HAZEN STREET,
EAST ELMHURST, NEW YORK, 11370

cc: ATTORNEY'S for ADA CHARLES KEE
One Hogan Place,
New York, New York, 10013

cc: CHAMBERS OF CHIEF JUDGE COLLEEN MCMAHON
UNITED STATES COURTHOUSE
500 PEARL STREET,
NEW YORK, NY 10007-1312

cc: Assistant Corporation Counsel, David Cooper
The City of New York Law Department
100 CHURCH STREET, NEW YORK, NY 10007

TITUS MCBRIDE#349-140-5784
Robert N. Davoren Center(RNDC)
11-11 HAZEN STREET,
EAST ELIHURST, NEW YORK, 11370

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NEW YORK, NEW YORK, 10007

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